1	KRISTOPHER A. NELSON (CA BAR NO. 342552)		
2	TRE LEGAL PRACTICE		
	1155 Market Street, Tenth Floor San Francisco, CA 94103		
3	Telephone: (415) 873-9199		
4	Facsimile: (415) 952-9898		
5	Email: telder@trelegal.com, knelson@trelegal.com		
6	S. Tomiyo Stoner (CA Bar No. 289246) Undaunted Law Firm, P.C.		
7	600 California St., Floor 7		
	San Francisco, CA 94108		
8	Telephone: (214) 415-7340		
9	E-mail: tstoner@undauntedlaw.com		
10	Attorneys for Plaintiff		
11	Kevin E. Gilbert, Esq. (SBN: 209236)		
12	kgilbert@ohhlegal.com		
	Nicholas D. Fine, Esq. (SBN: 285017) nfine@ohhlegal.com		
13	ORBACH HUFF & HENDERSON LLP		
14	6200 Stoneridge Mall Road, Suite 225		
15	Pleasanton, CA 94588 Telephone: (510) 999-7908 Facsimile: (510) 999-7918		
13			
16			
17	Attorneys for Defendant County of Alameda		
18	UNITED STATES DISTRICT COURT		
19			
20	FOR THE NORTHERN DISTRICT OF CALIFORNIA		
21	LISAMARIA MARTINEZ,	Case No. 3:20-cv-06570-TSH	
	Plaintiff,	JOINT STIPULATION AND	
22	,	[PROPOSED] ORDER EXTENDING DEADLINE FOR PLAINTIFF'S MOTION FOR ATTORNEYS' FEES	
23	V.		
24	COUNTY OF ALAMEDA, ,		
25	Defendant.		
26			
27			
28			

JOINT STIPULATION TO EXTEND DEADLINE FOR PLAINTIFF'S MOTION FOR 1 **ATTORNEYS' FEES** 2 3 The Parties previously stipulated to a deadline for Plaintiff to file a Motion for Attorneys' Fees to be no later than 21 days following the Court's adjudication of the County's Renewed 4 5 Motion for Judgment as a Matter of Law (ECF No. 211), which occurred on June 2, 2025 (ECF No. 219). 6 Plaintiff's counsel has discovered that due to a clerical error, the deadline was erroneously 7 calendared for 30 days instead of the agreed upon 21 days. The Parties have discussed the error 8 9 and agreed to enter this joint stipulation for the Court to extend the filing deadline for Plaintiff's Motion for Attorneys' Fees to June 30, 2025 (a 7-day extension). 10 11 12 Respectfully submitted, 13 DATED: June 20, 2025 TRE LEGAL PRACTICE 14 /s/ Timothy Elder 15 Timothy Elder 16 Attorneys for Plaintiff 17 18 DATED: June 20, 2025 ORBACH HUFF & HENDERSON LLP 19 20 /s/ Nicholas D. Fine Nicholas D. Fine 21 Attorneys for Defendant 22 23 24 25 26 27 28